

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

KIRK RAAB,)	
)	
Plaintiff,)	
)	
-vs-)	No. 08 C 50087
)	
COUNTY OF JO DAVIESS, JO DAVIESS))	
COUNTY SHERIFF'S OFFICE, SHERIFF))	
LEO HEFEL in his official capacity as))	
Sheriff of Jo Daviess County and his))	
Individual capacity, CHIEF DEPUTY))	
COLIN FULRATH, in his official capacity))	
As Chief Deputy and his individual capacity,)))	
DONALD SCHWEIHS, in his official))	
Capacity as County of Jo Daviess Public))	
Defender and in his individual capacity,))	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR EXTENSION OF TIME

Plaintiff, Kirk Raab, through his attorneys, Dolan Law Offices, P.C., and pursuant to FRCP 6(b)(1), respectfully moves this Court for an extension of time to file his response to defendants' motion to dismiss, 26(a) disclosures and to reset the pre-trial conference date of August 13, 2008. In support, Plaintiff Raab states as follows:

1. A complaint at law was filed on May 19, 2008 against the defendants' alleging violations of Section 1983 and equal protection, substantive due process, false light and intentional infliction of emotional distress.
2. The defendants filed a 12(b)(6) motion to dismiss on July 3, 2008. Plaintiff's response is due August 13, 2008.
3. Defendant's Counsel has been involved in a petition for leave to appeal which is currently pending before the Illinois Supreme Court and titled, Jerri Blount vs. Joseph

Stroud, No. 105577. That brief was recently filed.

4. Additionally, Plaintiff's counsel has been out of the office for the last ten days.
5. This matter is set for pre-trial conference on August 13, 2008.
6. Plaintiff Kirk Raab asks for a twenty-one day extension to file his response to defendants' 12(b) (6) motion to dismiss and Rule 26 (a) disclosures. Defense Counsel is aware of our request and does not have an objection. Additionally, Plaintiff requests the pre-trial conference scheduled for August 13, 2008 be reset. This extension is not being sought to delay this case nor to prejudice the defendants.

WHEREFORE, Plaintiff Raab requests a twenty-one day extension to file his response, Rule 26(a) Disclosures and reset the August 13, 2008 pre-trial conference date.

Respectfully Submitted:

/s/ Martin A. Dolan

An Attorney for Plaintiff Kirk Raab

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